

Exhibit 8
Filed Under Seal

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GOOGLE LLC,)
)
 PLAINTIFF,)
)
 VS.) NO.
) 3:20-cv-06754-
 SONOS, INC.,) WHA
)
 DEFENDANT.)
)
 SONOS, INC.,)
)
 PLAINTIFF,)
) 3:21-CV-07559-
 VS.) WHA
)
 GOOGLE, LLC,)
)
 DEFENDANT.)
)
)

ZOOM VIDEOTAPED DEPOSITION OF

ADAM GRAHAM, VOLUME 2

WEDNESDAY, MAY 18, 2022

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JOB NO. 5240890

REPORTED BY: D'ANNE MOUNGEY, CSR 7872

<p>1 speak with anyone about the substance of your 2 testimony? 3 A I did not. 4 Q I want to stay on this exhibit for just a 5 little while longer. 12:02:11 6 I believe earlier in your deposition you 7 testified that Sonos had a collaboration with QQ? 8 A That is correct. 9 Q Is it your testimony that the QQ Music 10 could solve the beer test? 12:02:45 11 A I don't believe that was my testimony. I 12 believe -- I don't recall -- I don't recall fully, 13 but I don't believe it did. 14 Q Okay. Just to make your testimony clear, 15 it's not your opinion that QQ solved the beer test; 12:03:01 16 is that correct? 17 A It's not my recollection, correct. I can't 18 100 percent confirm that. 19 Q Do you recall who within Sonos worked on 20 the QQ integration? 12:03:19 21 A Yeah. I believe in the prior testimony, we 22 had mentioned Kristen Bender was a part of that 23 work. 24 Q Do you recall anybody else? 25 A I believe Tad Coburn. 12:03:38</p>	<p>1 A That is correct. 2 Q And I just want to get an understanding of 3 kind of what's on this page. 4 So starting from left to right, it -- the 5 document seems to progress from QQ Music to Google 12:05:47 6 P2 to other projects. 7 Is that a fair characterization? 8 A That looks to be a fair characterization, 9 correct. 10 Q And under the category -- or project, 12:06:06 11 rather, for example, under QQ Music, there are a 12 number of bullet points and these bullet points are 13 features that are associated with that particular 14 integration; is that correct? 15 A That looks to be my understanding. 12:06:31 16 One clarification, I don't know if they're 17 all features. It might be just kind of more 18 descriptions in some cases of the implementation. 19 Q Okay. And one of the descriptions of the 20 QQ Music implementation would be that it utilized a 12:06:50 21 private Local Queue; is that correct? 22 A That's what it states here, correct. 23 Q And what it does not state is that one of 24 the features is a private Cloud Queue; is that 25 correct? 12:07:12</p>
<p>Page 230</p> <p>1 Q Anyone else? 2 A I believe Andy Schulert was involved. 3 Q Anyone else? 4 A And then the Sonos team members from the 5 Sonos China team, but I don't remember exactly who. 12:03:56 6 Q Okay. Do you know when the collaboration 7 began, or integration began? 8 A I actually don't know when it began. 9 Q Do you know roughly when it concluded? 10 A I don't recall, but my guess is -- I think 12:04:18 11 I started in 2012, so guessing here, I want to say 12 it was like early 2013. I don't recall. Maybe 13 February, March. I don't know. Again, this is just 14 pure guess. 15 Q And was this integration implemented for 12:04:42 16 the United States or in China? 17 A My recollection is that it was just for 18 China. 19 Q If you could turn back to the first page of 20 this exhibit, which for the record is 1037, and at 12:05:15 21 the top it says "P2S Tech Roadmap." 22 Do you see that? 23 A I do. 24 Q The P2S refers to Play to Sonos; is that 25 correct? 12:05:35</p>	<p>Page 232</p> <p>1 A That is not written here, that is correct. 2 Q And do you have an understanding as to 3 whether or not QQ Music used that private Cloud 4 Queue? 5 MR. LEE: Objection to form. 12:07:24 6 THE WITNESS: Based on this document and my 7 recollection, I don't believe it did, but I wasn't 8 the technical -- I didn't implement this. 9 BY MR. WILLIAMS: 10 Q And one of the progressions from -- or the 12:07:37 11 next progression from QQ Music was the Google V2 12 integration; is that correct? 13 A That's what's on this document, correct. 14 Q Just for the record, you don't have a 15 reason to disagree with what's on this document; 12:07:56 16 correct? 17 A I don't have a reason to disagree, correct. 18 Q Okay. And one of the features of the 19 Google V2 integration would be the -- utilized a 20 private Cloud Queue; is that correct? 12:08:16 21 A That's what this document states. 22 Q And you're not aware of any other Play to 23 Sonos integration that implemented a private Cloud 24 Queue prior to Google V2; correct? 25 MR. LEE: Objection to form. 12:08:51</p>

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1 THE WITNESS: I don't recall.	1 partners, but, again, that's recollection from
2 BY MR. WILLIAMS:	2 today.
3 Q Just so we're clear, as you sit here today,	3 Q So that's pure speculation; is that fair?
4 you don't have any knowledge as to if one existed at	4 A To the best -- yeah, the best I got today.
5 the time; correct? 12:09:19	5 Q And you don't -- or excuse me. 12:12:26
6 A I don't have any recollection, that's	6 Do you have any knowledge as to whether or
7 correct.	7 not Google was independently working on solving the
8 Q Do you have any knowledge as to any	8 beer test?
9 differences between a private Local Queue and a	9 MR. LEE: Objection to form.
10 private Cloud Queue as used here on page 1 between 12:09:43	10 THE WITNESS: The problem I have with that 12:12:45
11 QQ Music and Google V2?	11 question is I don't believe the beer test was a
12 MR. LEE: Objection to form.	12 Google term. That to me is a Sonos specific thing,
13 THE WITNESS: It would be -- I don't have a	13 so I have no knowledge whether or not -- what they
14 full recollection. It would be my best recreation	14 were doing.
15 of what I think from today, so I can't answer that 12:10:04	15 BY MR. WILLIAMS: 12:12:57
16 independently so I don't recall.	16 Q Right.
17 BY MR. WILLIAMS:	17 It might not be the exact -- those exact
18 Q You can give me your best recollection as	18 words, but the substance of the beer test, were you
19 you remember today.	19 aware of whether or not Google was independently
20 A You know, QQ was the first run. It talks 12:10:17	20 working on the same feature? 12:13:12
21 about using UPnP to communicate, so that suggests to	21 A I have no knowledge.
22 me -- again, I forget all the details of this.	22 Q I think you just testified that under QQ,
23 But I believe -- if I'm recalling	23 the UPnP suggests to you that the beer test was not
24 correctly, QQ didn't solve the beer test and that	24 met.
25 was the hope in Google V2, was to solve the beer 12:10:36	25 And why was that? 12:13:47
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1 test.	1 What is the basis for that testimony?
2 Q When you say with the help of Google V2 to	2 A So this is just from my basic
3 solve the beer test, what do you mean by that?	3 understanding. UPnP is a local protocol, so you
4 A I believe with QQ, that it didn't pass the	4 would need to be on network for that to work and
5 beer test. So if the controller left, the music 12:11:10	5 then, therefore, breaking the beer test. 12:14:06
6 would eventually stop.	6 Q You testified a lot today and on Friday
7 I believe the goal with Google -- and I	7 regarding the Sonos Music API.
8 can't recall if this was met or not -- was to	8 How, if at all, did the Sonos Music API fit
9 actually solve that problem.	9 into the QQ Music integration?
10 Q Do you know whether it was Sonos's or 12:11:24	10 MR. LEE: Objection to form. 12:14:52
11 Google's idea to implement -- to have V2 solve the	11 THE WITNESS: Yeah. I don't know.
12 beer test?	12 The one thing that I can state, I
13 MR. LEE: Objection to form.	13 believe -- and this is the best of my
14 THE WITNESS: That would be speculation on	14 recollection -- I believe there is a SMAPI QQ
15 my part. I don't recall. 12:11:42	15 implementation. So QQ Music implemented a service 12:15:14
16 BY MR. WILLIAMS:	16 on Sonos via SMAPI.
17 Q To the best of your recollection, do you	17 BY MR. WILLIAMS:
18 know whose initiative that was?	18 Q Okay. And the QQ implementation on
19 A I always attribute it to Sonos. I've heard	19 Sonos -- sorry.
20 since -- I recall since I started there, that the 12:11:53	20 The QQ implementation of the -- sorry. 12:15:49
21 beer test was always important to us, and my	21 QQ Music implementation on Sonos via SMAPI,
22 recollection was that it was always more important	22 did that satisfy the beer test?
23 to us than to our partners.	23 MR. LEE: Objection to form.
24 It's something that we always kind of	24 THE WITNESS: This would be just my opinion
25 believed in and it always felt more so than our 12:12:05	25 again; is that okay? 12:16:11
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